

REMARKS

Claim 8 was canceled because it depended from previously canceled claim 6.

- I. Claims 1-16 and 20-21 were rejected under 35 U.S.C. §103(a) as being unpatentable over Nakajima *et al.*, U.S. Patent Application Publication No. 2001/0055029 in view of Fung '882. The applicant respectfully traverses this rejection for the following reason(s).**

Claim 1

Claim 1 is directed towards *a display system receiving a video signal from a computer and displaying a picture on a screen corresponding to the video signal*, the display system comprising, in part:

an input terminal; and a signal processor converting an input signal applied to said input terminal into an output signal to be recognized by said computer. Applicant's paragraph [0025] input connectors 52a and 54a of mouse 52 and keyboard 54 are coupled to input terminals 32 and 33 formed on display device 10, respectively.

Note that the preamble is essential to the understanding of the invention. The claimed *display system* corresponds to display device 10 in Applicant's Figs. 1 and 2. Display device 10 receives a video signal from a computer 1 and displays a picture on a screen 12 corresponding to the video signal.

The Examiner indicates that Nakajima teaches "an input terminal (the mouse (105) and the keyboard (104) are connected to the input terminal of the display device (103) **from the host computer (102))**" (emphasis added).

A review of Nakajima fails to show where Nakajima teaches the foregoing. In Figs. 1 and 2, the mouse (105) and the keyboard (104) are connected to the input terminal of the display device (103) directly, **not** from the host computer (102). In Fig. 6, the mouse (105) and the keyboard (104) are connected to the input terminal of the host computer (102) directly, and **are not** connected to the display device (103) from the host

computer (102).

In Fig. 2, Nakajima's input devices (104, 105) are directly connected to a switching circuit 203. Switching circuit 203 connects the input device (104, 105) to either computer 101 or computer 102. Switching circuit 203 is not *a signal processor converting an input signal applied to said input terminal into an output signal to be recognized by said computer*. Switching circuit 203 merely directs the signals, which are already recognizable by either computer (101, 102), input by the input devices to the proper computer under the control of switching control unit 204.

In Fig. 6, Nakajima's input devices (104, 105) are directly connected to host computer 101, contrary to the requirement of Applicant's claim 1. Applicant's claim 1 requires the input signal to be input to the display device (Nakajima's display device 103, and additionally requires Nakajima's display device 103 to comprise *a signal processor therein for converting an input signal applied to said input terminal into an output signal to be recognized by said computer*.

Here the Examiner refers us to Nakajima's character signal processing, Fig. 7, 705, and suggests that the characters entered using the keyboard have to be converted into a computer language for the computer to understand.

Nakajima's FIG. 7 is a block diagram showing a construction of the tuner 112. FIG. 6 is a diagram showing a construction of a display control system 200. Note here that Fig. 6 is the figure illustrating keyboard 104 and mouse 105 being directly connected to computer 101, and there is no teaching with respect to Fig. 6 that the keyboard 104 or mouse 105 is in any way connected to display device 103 or tuner 112.

The character signal processing circuit 705, referred to by the Examiner, forms a program table on the basis of the broadcasting scheduled information and successively preserves and writes it into a memory 706, thereby continuously updating the latest program table. In response to a request from the control unit 707, data of the program table is sent to the host computer 101.

Contrary to the Examiner's rejection, there is no teaching whatsoever in Nakajima to suggest that character signal processing circuit 705 converts characters entered using the keyboard into a computer language for the computer to understand.

The Examiner is respectfully requested to identify the paragraph in Nakajima which teaches that character signal processing circuit 705 converts characters entered using the keyboard into a computer language for the computer to understand, or withdraw the rejection.

Note that the Examiner has not relied on Fung with respect to the foregoing features of claim 1.

Accordingly, the rejection of claim 1 is deemed to be in error and should be withdrawn.

Claim 1 also calls for *a data interface coupled to the signal processor and connected between the computer and the display system.*

Here the Examiner refers to signal lines of Fig. 1 (106,107, and 108), which transfer data from the computer (101) to the display device (103).

First, it is not clear why the Examiner is jumping between two different embodiments (Figs. 1/2 and Figs. 6/7) without providing an statement why it would have been obvious to one skilled in the art to combine the two different embodiments.

One cannot pick and choose among the individual elements of assorted prior art references to recreate the claimed invention. See, e.g., *Azko N.V. v. United States Int'l Trade Comm'n* , 808 F.2d 1471, 1481, 1 USPQ2d 1241, 1246 (Fed. Cir. 1986), cert. denied , 107 S.Ct. 2490 (1987).

Additionally, signal lines 106,107, and 108 in Nakajima's Fig. 1 are **not coupled** to the *signal processor* identified by the Examiner to correspond to Nakajima's signal processing circuit 705, contrary to the requirement of the foregoing feature of Applicant's claim 1.

Note that the Examiner has not relied on Fung with respect to the foregoing feature of claim 1.

Accordingly, the rejection of claim 1 is deemed to be in error and should be withdrawn.

Further, claim 1 calls for *a controller transmitting the output signal to the computer via the signal processor and the data interface and generating an activation control signal to the input terminal and an output terminal when the input signal represents an activation signal to initiate an increase in consumption of energy by an external apparatus coupled to the input and output terminal.*

First, the Examiner refers us to Nakajima's control unit 707 with respect to the claimed *controller*. Nakajima's control unit 707 sends a request to character signal processing circuit 705 for data of the program table to be sent to the host computer 101.

As set forth in paragraph [0087] the control unit 707 sends the data of the program table to the host computer 101.

Accordingly, Nakajima's *controller* (control unit 707) **does not** transmit an output signal to the computer *via the signal processor* (character signal processing circuit 705) and the data interface (signal lines 106,107, and 108), contrary to the requirement of claim 1.

Note that the Examiner has not relied on Fung with respect to the foregoing feature of claim 1.

Accordingly, the rejection of claim 1 is deemed to be in error and should be withdrawn.

Further yet, the Examiner notes that Nakajima is silent with respect to the feature of the *controller . . . generating an activation control signal to the input terminal and an output terminal when the input signal represents an activation signal to initiate an*

increase in consumption of energy by an external apparatus coupled to the input and output terminal.

Here the Examiner refers us to Fung.

The Examiner indicates that Fung provides procedures 110 for operating storage devices, such as the RAID hard disc drives, so as to reduce power or energy consumption and to increase effective disc drive life. The Examiner notes that these procedures may be stored in memory 112 (either host memory or controller memory) during execution by the processor (either the host processor or the controller processor (Fig. 6)).

Note here that claim 1 calls for **initiating** *an increase in consumption of energy by an external apparatus coupled to the input and output terminal*. Fung's teaching of reducing power or energy consumption is clearly not a teaching of **initiating** *an increase in consumption of energy*.

The Examiner hold that it would have been obvious to utilize the controller as taught by Fung in the system disclosed by Nakajima "because this would provide network architecture, computer system and/or server, circuit, device, apparatus, method, and computer program and control mechanism for managing power consumption and workload in computer system and data and information servers."

The Examiner has failed to provide a *prima facie* basis of obviousness because there has been no showing that one of ordinary skill in the art would have been motivated to modify Nakajima to include to following claimed subject matter:

- A. *initiate an increase in consumption of energy by an external apparatus;*
- B. *generating an activation control signal to the input terminal and an output terminal;*
- C. *a signal processor converting an **input signal** applied to the input terminal into an output signal to be recognized by the computer, wherein the **input signal** represents an activation signal to initiate an increase in consumption of energy by an external apparatus; or*

D. *an external apparatus coupled to the input and output terminal.*

Accordingly, the rejection of claim 1 is deemed to be in error and should be withdrawn.

In re Rijckaert, 228 USPQ2d 1955 (CAFC 1993) states:

"A *prima facie* case of obviousness is established when the teachings from the prior art itself would appear to have suggested **the claimed subject matter** to a person of ordinary skill in the art." *In re Bell*, 991 F.2d 781, 782, 26 USPQ2d 1529, 1531 (Fed. Cir. 1993) (quoting *In re Rhinehart*, 531 F.2d 1048, 1051, 189 USPQ 143, 147 (CCPA 1976). If the examiner fails to establish a *prima facie* case, the rejection is improper and will be overturned. *In re Fine*, 837 F.2d 1071, 1074, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988).

Claim 2

Claim 2 requires that *the controller regulates the signal processor to convert the input signal into a control signal controlling the computer, stores the control signal in the memory, and transmits the control signal from the memory to the computer via the data interface.*

Note that claim 1 requires that the *input signal represents an activation signal to initiate an increase in consumption of energy by an external apparatus* and that the *signal processor converts the input signal applied to the input terminal into an output signal to be recognized by the computer.*

There is no teaching in the combined applied art to suggest that Nakajima's character signal processor 705 (*signal processor*) would have any capability to convert an *activation signal to initiate an increase in consumption of energy by an external*

apparatus. Nor is there any teaching that Nakajima's control unit 707 would regulate character signal processor 705 to convert an *activation signal to initiate an increase in consumption of energy by an external apparatus*.

Nakajima's character signal processor 705 forms a program table on the basis of the broadcasting scheduled information and successively preserves and writes it into a memory 706, thereby continuously updating the latest program table. In response to a request from the control unit 707, data of the program table is sent to the host computer 101.

Nakajima's "program table" does not have the function of *a control signal controlling the computer*.

Note that the Examiner has not relied on Fung with respect to the foregoing feature of claim 2.

Accordingly, the rejection of claim 2 is deemed to be in error and should be withdrawn.

Claim 3

Claim 3 calls for *an on-screen display generator providing a variable video display for setting up a displaying condition, wherein the controller controls the on-screen display generator to generate the video display in response to the input signal*.

Here the Examiner refers us to Nakajima's display unit 201 with respect to the claimed *on-screen display generator*. The Examiner then states that Nakajima teaches that

control unit 707 (Fig. 7) controls display unit 201.

A review of Nakajima finds no such teaching.

The Examiner is respectfully requested to identify the paragraph in Nakajima which teaches that control unit 707 controls display unit 201, or withdraw the rejection.

Note that the Examiner has not relied on Fung with respect to the foregoing features of claim 3.

Accordingly, the rejection of claim 3 is deemed to be in error and should be withdrawn.

Claim 4

Claim 4 calls for, in part, *an input mode selector providing one of a computer input mode and a display system input mode for respectively recognizing the input signal as an output signal to be applied to the computer and as a control signal for controlling the display system.*

Here the Examiner apparently refers to Nakajima's switching circuit 202 as the *input mode selector*. Nakajima discloses that a video signal 108 from host computer 101 and a video signal 111 from the host computer 102 are inputted to video switching circuit 202 of the display device 103. Either one of them is selected and sent to the display unit 201 and is displayed and outputted as video data.

Clearly Nakajima's video switching circuit cannot possibly have a function of *providing one of a computer input mode and a display system input mode for respectively*

recognizing the input signal as an output signal to be applied to the computer and as a control signal for controlling the display system.

Note that the Examiner has not relied on Fung with respect to the foregoing features of claim 4.

Accordingly, the rejection of claim 4 is deemed to be in error and should be withdrawn.

Claim 5

Claim 5 requires that the invention set forth in claim 1 be further comprised of *the input terminal coupled to at least one of a mouse and a keyboard.*

Looking back to claim 1 the invention called for *a signal processor converting an input signal applied to said input terminal into an output signal to be recognized by said computer.* In rejecting claim 1 the Examiner referred us to Nakajima's character signal processor 705 with respect to the claimed *signal processor*. Additionally, the Examiner erroneously suggests that the characters entered using the keyboard have to be converted into a computer language for the computer to understand by character signal processor 705.

The Examiner has failed to show where Nakajima teaches that character signal processor 705 has an input terminal coupled to the keyboard 104 or mouse 105.

Note that the Examiner has not relied on Fung with respect to the foregoing features of claim 5.

Accordingly, the rejection of claim 5 is deemed to be in error and should be withdrawn.

Claims 9-16, 20 and 21 are deemed to be nonobvious in view of the applied art for the same reasons as argued above with respect to claims 1-5.

II. Claim 17 is rejected under 35 U.S.C. §103(a) as being unpatentable over Nakajima *et al.* '029 in view of Boldt, U.S. Patent No. 4,251,759. The applicant respectfully traverses this rejection for the following reason(s).

Claim 17 depends from claim 9. The rejection of claim 9 also applied the teachings of Fung as a basis of obviousness. Accordingly, the statement of rejection of claim 17 should have included reference to Fung.

Note, that like claim 1, the combination of Nakajima and Fung fails to at least establish a *prima facie* basis of obviousness with respect to the feature in claim 9 of *the controller controlling the video signal in response to reception of the input signal during the display device input mode and generating an activation control signal to the input and output terminal when the input signal represents an activation signal to initiate an increase in consumption of energy by an external apparatus coupled to the input and output terminal.*

Boldt fails to provide any teaching supporting the rejection of claim 9.

Accordingly, the rejection of claims 9 and 17 are deemed to be in error for the same reasons as argued above with respect to claim 1 and should be withdrawn.

III. Claim 18 is rejected under 35 U.S.C. §103(a) as being unpatentable over Nakajima *et al.* '029 in view of Hwang, U.S. Patent No. 6,121,962. The applicant respectfully traverses this rejection for the following reason(s).

Claim 18 depends from claim 9. The rejection of claim 9 also applied the teachings of Fung as a basis of obviousness. Accordingly, the statement of rejection of claim 18 should have included reference to Fung.

Note, that like claim 1, the combination of Nakajima and Fung fails to at least establish a *prima facie* basis of obviousness with respect to the feature in claim 9 of *the controller controlling the video signal in response to reception of the input signal during the display device input mode and generating an activation control signal to the input and output terminal when the input signal represents an activation signal to initiate an increase in consumption of energy by an external apparatus coupled to the input and output terminal.*

Hwang fails to provide any teaching supporting the rejection of claim 9.

Accordingly, the rejection of claims 9 and 18 are deemed to be in error for the same reasons as argued above with respect to claim 1 and should be withdrawn.

IV. Claims 24 and 25 are rejected under 35 U.S.C. §103(a) as being unpatentable over Nakajima *et al.* '029. The applicant respectfully traverses this rejection for the following reason(s).

Claim 24

Claim 24 calls for, in part, *receiving an **input signal** from a mouse or a keyboard at an input terminal of the display device; and receiving a video signal and transmitting an output signal via an input and output (I/O) connector disposed within the display device; alternatively selecting one of a first mode and a second mode; **converting the input signal** into a converted signal to be identified by a computer when the first mode is selected.*

The Examiner suggests that Nakajima's computer inherently includes a converter (not shown) to convert an input signal from a keyboard or mouse to be recognized by the computer.

However, it is required that the conversion be performed *when the first mode is selected.*

The Examiner has suggested that Nakajima teaches *alternatively selecting one of a first mode and a second mode* by referring to video switching circuit 202 for selecting either the video signal 108 or the video signal 111.

The Examiner has not explained how the selection of either of these signals (108 or

111) influence the process of *converting the input signal into a converted signal to be identified by a computer.*

It is required by claim 24 that *converting the input signal into a converted signal to be identified by a computer occurs when the first mode is selected.*

Clearly, this feature is not taught by the applied art.

Accordingly, the rejection of claim 24 is deemed to be in error and should be withdrawn.

Claim 24 also calls for *receiving a video signal and transmitting an output signal via an input and output (I/O) connector disposed within the display device and transmitting the converted signal via the I/O connector to the computer for analysis.*

The Examiner suggests that Nakajima's computer inherently includes a converter (not shown) to convert an input signal from a keyboard or mouse to be recognized by the computer.

It is not clear from the rejection which element in the applied art is being referred to as the *I/O connector.*

What is clear from the applied art, however is that there is no teaching of an I/O connector *disposed within the display device* that has the functions of *receiving a video signal and transmitting an output signal* as well as *transmitting the converted signal to the computer for analysis.*

Accordingly, the rejection of claim 24 is deemed to be in error and should be

withdrawn.

Claim 24 also calls for *making a determination whether the input signal is identical to a reference; and generating to the I/O connector an activation control signal for activating an external apparatus coupled to the I/O connector in accordance with the determination.*

The Examiner notes that the foregoing features are not taught by Nakajima.

The Examiner erroneously suggests that the foregoing features would have been obvious "because it would improve the switching displays."

The Examiner has failed to show that there is a problem with "switching displays" in Nakajima, such that one of ordinary skill in the art would have known of the problem and looked for a solution to improve Nakajima.

There must be a teaching in the art of such a problem or it must be shown how one of ordinary skill in the art would know that such a problem exists in Nakajima. It is impermissible within the framework of §103 to "manufacture" a problem and then state it would have been obvious to fix the problem.

Additionally, the Examiner's basis of obviousness fails to provide a *prima facie* showing that improving the switching displays has any relationship to the claimed feature of *activating an external apparatus coupled to the I/O connector in accordance with the determination.*

Accordingly, the rejection of claim 24 is deemed to be in error and should be

withdrawn.

Claim 25

Claim 25 is similar to claim 24 and is therefore deemed to be nonobvious for the same reasons as claim 24.

Claim 25 differs from claim 24 with respect to the feature of *making a determination whether the input signal is not identical to a reference*.

The Examiner has failed to provide a *prima facie* showing where Nakajima teaches *making a determination whether the input signal is not identical to a reference*. The Examiner merely states it would have been obvious to make a determination, but does not state what the determination is in respect to.

Additionally, claim 25 calls for *receiving an input signal from a mouse or a keyboard at an input terminal of the display device and preventing the input signal from being transmitted to the I/O connector in accordance with the determination*.

The Examiner has failed to provide a *prima facie* explanation of why one of ordinary skill in the art would have wanted to prevent input signals from Nakajima's keyboard or mouse from being input.


Accordingly, the rejection of claim 24 is deemed to be in error and should be withdrawn.

The examiner is respectfully requested to reconsider the application, withdraw the

objections and/or rejections and pass the application to issue in view of the above amendments and/or remarks.

A fee of \$120.00 for large entity is incurred by filing of a petition for a one month extension of time, set to expire on **14 March 2008**. Applicant's check drawn to the order of Commissioner accompanies this Amendment. Should the check become lost, be deficient in payment, or should other fees be incurred, the Commissioner is authorized to charge Deposit Account No. 02-4943 of Applicant's undersigned attorney in the amount of such fees.

Respectfully submitted,



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